

CRITCHLEY, KINUM & LURIA, LLC

ATTORNEYS AT LAW

75 LIVINGSTON AVENUE - SUITE 303
ROSELAND, NEW JERSEY 07068

MICHAEL CRITCHLEY
MICHAEL CRITCHLEY, JR.
CHRISTOPHER W. KINUM
AMY LURIA

ARMANDO SUAREZ

(973) 422 - 9200

FAX: (973) 422 - 9700
www.critchleylaw.com

June 28, 2023

Via ECF

The Honorable Julian X. Neals
United States District Court
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street, Newark, New Jersey 07102

Re: IQVIA Inc. et al. v. Veeva Systems, Inc., No. 2:17-cv-00177-JXN-JSA ("IQVIA I")

Dear Judge Neals:

We write on behalf of IQVIA Inc. and IMS Software Services, Ltd. (collectively, "IQVIA") concerning the Court's June 21, 2023 Order (Dkt. 542) to respectfully request that the Court extend IQVIA's deadline to respond to Veeva's June 20, 2023 letter (Dkt. 541) by 14 days, from July 3, 2023, to July 17, 2023. Veeva has indicated that it does not oppose IQVIA's request for this modest extension.

Veeva filed a letter with this Court on June 20, 2023, concerning its recent, untimely production of over 7,000 files consisting of over 1,200 GB of data, that Veeva claims are related to Veeva's destruction of evidence and the resulting sanctions recommended by the Special Master. See Dkt. 541; *see also* Dkt. 349 (Sanctions Order). Veeva's letter came without prior notice to IQVIA, many months after the close of fact discovery in this case, months after opening expert reports were exchanged, and years after Judge Kavanaugh's Sanctions Order.

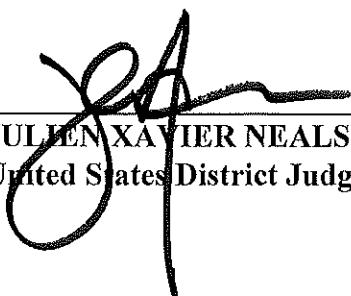
IQVIA requires additional time to analyze this voluminous production by Veeva to try to make sense of what is in it. Indeed, it took several days just to load the production, and IQVIA's experts require additional time to comb through it. Accordingly, IQVIA respectfully requests this modest extension to July 17 so IQVIA's response can be informed by this analysis.

Respectfully submitted,

/s/ Amy Luria

Amy Luria
Counsel for IQVIA

So ORDERED on 6/29/2023:


JULIEN XAVIER NEALS
United States District Judge